



What should Vermont's *New AMPs* look like?

by

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It has been suggested that water is the premier forest product. The *Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont* (AMPs) were adopted in 1987 to help prevent discharges from logging operations. The Vermont Department of Forests, Parks, and Recreation is currently reviewing the AMPs and making recommendations for revising them.

In the twenty-five years since the AMPs were introduced, the climate, the utilization intensity and the harvesting equipment have all changed significantly. Storms have become more frequent and violent. Biomass markets for wood products have expanded dramatically leading to increased utilization. And the harvesting equipment has changed a lot as well. Any proposed changes to the AMPs must take these and many other factors into account.

Wild, self-willed forests produce the highest quality water of any land use. They accomplish this in a wide variety of ways. Wild forests develop horizontally and vertically complex canopies that intercept rain waters and shade stream waters. They also develop a stable, humus-rich mat that blankets the forest floor and enhance water infiltration. The best way to assure that wild forests continue to produce clean, clear, cold, highly-oxygenated water is simply to leave them alone. However, forests can be used to produce timber and biomass while protecting water quality if practices such as Vermont's AMPs are fully implemented.

Assessing impacts of forest management practices on forest health requires a very long commitment. Perhaps the longest and most credible of these 'long-term ecological studies' or LTES was started at the Coweeta Hydrologic Laboratory in 1938. Much of what is known about minimizing logging impacts to forest hydrology can be traced back to the research conducted at the Coweeta.

Vermont's AMPs are based on excellent science such as that conducted at the Coweeta. We know that they work when they are used. The challenge is

to achieve very high compliance with them. In 1988, looking back at 50 years of research, Researcher L.W. Swift summarized the Coweeta findings this way: "Guidelines which minimize the impact of road construction and use on water quality are available for forest road design. The task is to apply these in land management."

Part of the task at hand is to increase information for landowners, loggers, consulting foresters, and the general public. A second important challenge is economic. Full compliance with the AMPs costs money. For example, properly closing a one mile stretch of 20% grade skid trail requires the installation of 117 waterbars. At \$30 per waterbar, that adds up to over \$3500. Assuming the steep trail provides access to a 50-acre mountain forest, it would take over 3 years of stumpage growth to pay the cost of installing just the erosion control!

Until recently the Vermont's AMPs have been voluntary. The Vermont Current Use Program has recently been changed to require full compliance with the AMPs and landowners are now required to commit to that right on the signature page. Although the intent of the UVA changes is undoubtedly good, expecting full compliance with all applicable practices contained in the AMPs may not be realistic at this point.

Vermont Family Forests strongly supports efforts to conserve water quality and the ecological health of Vermont's forests. Any revisions to the AMPs should be done carefully and holistically while recognizing the economic and ecological constraints faced by landowners and their loggers. Here are a few suggestions:

- Keep the AMPs as clear and as simple as possible.
- Give landowners more latitude in choosing site-specific practices by initiating a Conditional Management Practice (CMP) option.
- Give landowners more latitude in avoiding water quality impacts by initiating Optional Conservation Strategies (OCS) that would encourage leaving forests alone on steep slopes, in riparian zones, and in other fragile areas.
- Create a credible, cost-effective, user-friendly system for monitoring compliance.
- Explore ways to encourage the use of more forwarders perhaps through the new *Vermont Working Landscape Initiative*.
- Explore ways to place more emphasis and higher priority on cost-share practices that conserve water quality.
- Although it may be unavoidable and tolerated under certain limited conditions, skidding and trucking through streams should not be considered an acceptable practice. If we are serious about conserving

water quality, then fording streams with logging trucks and skidders should be very limited and regarded as a conditional practice.

- Develop "A Silvicultural Guide for Maintaining Water Quality on Vermont's Working Forests".
- Be sure that full AMP compliance and associated monitoring are woven into wood procurement standards and fuel cost determination for proposed, publicly-funded biomass facilities.

For more details see:

<http://www.familyforests.org/documents/VFFCOMMENTSonAMPApril2012draft.pdf>

In 1939 Aldo Leopold published an essay entitled *The Farmer as a Conservationist*. He wrote, "Conservation means harmony between people and land. When land does well for its owner, and the owner does well by the land; when both end up better by reason of their partnership, we have conservation. When one of the other grows poorer, we do not."

Doing well by the land (including water!) as well as the people is still the task at hand. *May the forest be with us!*